

June 14, 2007

TO: Market Advisory Committee, California Air Resources Board

Cc: Linda Adams, Secretary for Environmental Protection  
Dan Skopec, Undersecretary, Cal EPA  
Eileen Tutt, Deputy Secretary, Cal EPA  
Dr. Robert Sawyer, Chairman, ARB  
Catherine Witherspoon, Executive Officer, ARB  
Chuck Shulock, Climate Change Program Manager, ARB

FROM: Thomas H. Fry, Community Recycling and Resource Recovery, Inc.

RE: Recommendations for Designing a Greenhouse Gas Cap-and-Trade  
System for  
California

Community Recycling and Resource Recovery is responding to the recent Market Advisory Committee draft recommendations for the potential design of a market system under AB32. In particular, we are concerned by your recommendation that the market cap should exclude fugitive landfill gas emissions, including methane.

We understand your concern that there are difficulties in monitoring such emissions and indeed there are extremely differing views regarding landfill methane emissions, as well as the efficacy of landfill gas capture systems.

However, that is just makes it even more important to include landfill gas emissions and review the results of the current State landfill studies for assistance in identifying monitoring approaches.

The recent IPPCC estimates of lifetime gas capture efficiencies and issues related to emissions from high methane materials such as food waste prior to the installation of capture systems heighten our concern over this issue.

Furthermore, your recommendation that projects that capture landfill gas be incorporated in an offsets program means that landfill operators will be able to reap the benefits of an offset program from landfill gas to energy but experience no negative consequences for the disposal of organic

material. This recommendation would have the additional, if unintended, impact of increasing the delivery of organics to landfills, including high methane producing food and grass, as well as diverting these same organics away from other uses, including compost facilities.

Windrow composting of food and yard waste has been documented to result in a net reduction in emissions, while also decreasing the need for agricultural use of fertilizers, pesticides and water. At a time when increasing temperatures are endangering the future of many California crops, composting should be encouraged, rather than inhibited by decisions to reward landfilling of solid waste.

Community Recycling owns the largest compost facility in California, as well as 3,000 acres of farmland obtaining increased crop yields and

reductions in fertilizer use through compost application. At a time when both the quantity of landfill methane emissions and the efficiency of landfill methane capture systems are so in question, it is particularly important that the ARB not give landfill owners the benefit of credits without additional responsibility for methane emissions.

We welcome a dialogue with Committee members and ARB staff on this subject and would be pleased to answer any questions you may have.  
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